

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	CRIMINAL NO.: 04-10146-WGY
)	
v.)	
)	
ROBERT RAMOS)	

**GOVERNMENT'S ASSENTED-TO MOTION FOR DISCLOSURE OF THE PRESENTENCE
REPORT ON ROBERT RAMOS TO PSYCHOLOGICAL EXPERTS**

The United States of America hereby moves to disclose the contents of Defendant Robert Ramos' Presentence Report to the psychological experts who are retained in the above-captioned case to conduct a forensic psychological evaluation of the defendant. As grounds for this motion the government states that, on April 26, 2005, this Court granted the government's motion to have the defendant evaluated by a psychological expert to assess the defendant's mental condition for sentencing purposes. The government now seeks to disclose the contents of the defendant's Presentence Report to assist the government's psychological expert in evaluating the defendant's mental condition overall and in assessing whether the defendant was suffering from a significantly reduced mental capacity at the time he committed the offenses in the above-captioned case. The information that the Presentence Report contains about the defendant's family history and relations; his educational background and experience; his employment history; his relationship with his child and the mother of his child, the

target of the defendant's murder-for-hire scheme; his physical, mental and emotional health; and other matters provide a detailed profile of the defendant that would augment the evaluator's ability to conduct a comprehensive assessment and evaluation of the defendant's mental condition as it bears on sentencing. Defense counsel has assented to this motion because disclosure of the defendant's Presentence Report to the retained psychological experts will augment the defendant information available to the psychological experts retained by both parties in this case.

Based on the foregoing, the government respectfully moves to disclose the contents of the Presentence Report of Robert Ramos to the government's psychological expert.

Respectfully submitted,

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United States Attorney

By: /s/ Emily R. Schulman
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